

**FINAL STATEMENT OF REASONS
FOR PROPOSED BUILDING STANDARDS
OF THE STATE FIRE MARSHAL
REGARDING THE 2025 CALIFORNIA WILDLAND-URBAN INTERFACE CODE,
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 7
(SFM 04/25)**

The Administrative Procedure Act requires that every agency shall maintain a file of each rulemaking that shall be deemed to be the record for that rulemaking proceeding. The rulemaking file shall include a Final Statement of Reasons. The Final Statement of Reasons shall be available to the public upon request when rulemaking action is being undertaken. The following are the reasons for proposing this particular rulemaking action:

UPDATES TO THE INITIAL STATEMENT OF REASONS:

Government Code Section 11346.9(a)(1) requires an update of the information contained in the Initial Statement of Reasons. If the update identifies any data or any technical, theoretical, or empirical study, report, or similar document on which the state agency is relying that was not identified in the Initial Statement of Reasons, the state agency shall comply with Government Code Section 11347.1.

The State Fire Marshal (SFM) has not added any data (including technical, theoretical, or empirical studies, reports, or similar documents relied upon) that would necessitate an update of the information contained in the Initial Statement of Reasons.

MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS

Pursuant to Government Code Section 11346.9(a)(2), if the determination as to whether the proposed action would impose a mandate, the agency shall state whether the mandate is reimbursable pursuant to Part 7 of Division 4. If the agency finds that the mandate is not reimbursable, it shall state the reasons for the finding(s).

SFM has determined that the proposed regulatory action would not impose a mandate on local agencies or school districts.

OBJECTIONS OR RECOMMENDATIONS MADE REGARDING THE PROPOSED REGULATION(S).

Government Code Section 11346.9(a)(3) requires a summary of EACH objection or recommendation regarding the specific adoption, amendment, or repeal proposed, and an explanation of how the proposed action was changed to accommodate each objection or recommendation, or the reasons for making no change. This requirement applies only to objections or recommendations specifically directed at the agency's proposed action or to the procedures followed by the agency in proposing or adopting the action, or reasons for making no change. Irrelevant or repetitive comments may be aggregated and summarized as a group.

The text with proposed changes was made available to the public for a 45-day comment period from April 3, 2026, until May 18, 2026. The SFM received multiple public comments regarding the proposal. As a result, the SFM convened a CWUIC work group meeting to

discuss the comments received. Revisions recommended by the CWUIC work group were incorporated and made available to the public for a 15-day comment period from May 29, 2026, until June 13, 2026. One additional public comment was received.

COMMENTS RECEIVED DURING 45-DAY PUBLIC COMMENT PERIOD:

ITEM 1

Chapter 1 Administration

SUB-ITEMS 1-1 and 1-2

Division I California Administration, Section 1.1.2 Purpose and Division II Scope and Administration, Section 101.2 Scope

Commenter(s) and Recommendation:

California Building Industry Association, California Apartment Association, California Business Properties Association, and Building Owners & Managers Association.

The comments support the proposal.

Agency Response:

The SFM appreciates the support.

SUB-ITEM 1-3

Division II, Section 101.3.1 Application and 101.3.1.1 Application date and where required

The proposed amendments in these sections were included in the Emergency Regulations approved on October 15, 2025, with some changes identified in the Express Terms and explained in the ISOR.

Commenter(s) and Recommendation:

California Code Professionals: Darcy Davidson - Fire Marshal/Division Chief, Justin Gipson - Fire Marshal/Division Chief, Kevin Reinertson - Retired Division Chief, Larry Williams - Retired Assistant Fire Marshal, Marty Walters – County Coordinator, Plumas County Fire Safe Council, and Robert Marshall – Retired Deputy Fire Chief San Mateo Consolidated Fire Department

Requests that Item 4 be modified rather than deleted so local jurisdictions may designate additional fire hazard areas (such as Moderate Fire Hazard Severity Zones) by ordinance consistent with Government Code §51179(b)(2).

Agency Response:

The State Fire Marshal (SFM) appreciates the concerns expressed in the comments. The SFM will continue to evaluate and identify opportunities for reducing wildfire risk.

Commenter(s) and Recommendation:

California Building Industry Association, California Apartment Association, California Business Properties Association, and Building Owners & Managers Association.

The comments support the proposal.

Agency Response:

The SFM appreciates the support.

SUB-ITEM 1-4

Division II, Section 101.5 Additions or alterations

SFM proposes adopting section 101.5 about additions and alterations.

Commenter(s) and Recommendation:

California Building Industry Association, California Apartment Association, California Business Properties Association, and Building Owners & Managers Association.

The comments support the proposal.

Agency Response:

The SFM appreciates the support.

ITEM 3

Chapter 3 Wildland Urban Interface Areas

SUB-ITEM 3-1

Sections 301.1. Scope and 302.1.1 Fire Hazard Severity Zone Viewer

This amendment provides code users with the location of the Fire Hazard Severity Zone maps.

Commenter(s) and Recommendation:

California Building Industry Association, California Apartment Association, California Business Properties Association, and Building Owners & Managers Association.

The comments support the proposal.

Agency Response:

The SFM appreciates the support.

SUB-ITEM 3-3

Section 302.3 Local Designation

SFM proposes adding a new section to increase awareness.

Commenter(s) and Recommendation:

California Code Professionals: Darcy Davidson - Fire Marshal/Division Chief, Justin Gipson - Fire Marshal/Division Chief, Kevin Reinertson - Retired Division Chief, Larry Williams - Retired Assistant Fire Marshal, Marty Walters – County Coordinator, Plumas County Fire Safe Council, and Robert Marshall – Retired Deputy Fire Chief San Mateo Consolidated Fire Department.

Proposes adding a new Section 302.3.1 requiring local agencies to post notices identifying Fire Hazard Severity Zone maps. Intended to coordinate the implementation of local LRA designations and improve clarity.

Agency Response:

The State Fire Marshal (SFM) appreciates the concerns expressed in the comments. The SFM will continue to evaluate and identify opportunities for reducing wildfire risk.

ITEM 4

Chapter 5 Special Building Construction Regulations

SUB-ITEM 4-1

Section 503 and Section 503.1 General

Proposed changes in this section, identified with gray highlight, were included in the Emergency Regulations approved October 15, 2025. The rest of the proposal is from the 2025 CWUI Work Group – Ignition-resistant materials and weathering Subgroup – early-adopting provisions from the ICC 2024–2026 Code Development Cycle, Group A, as SFM amendments.

Commenter(s) and Recommendation:

California Code Professionals: Darcy Davidson - Fire Marshal/Division Chief, Justin Gipson - Fire Marshal/Division Chief, Kevin Reinertson - Retired Division Chief, Larry Williams - Retired Assistant Fire Marshal, Marty Walters – County Coordinator, Plumas County Fire Safe Council, and Robert Marshall – Retired Deputy Fire Chief San Mateo Consolidated Fire Department

Requests revisions clarifying that Chapter 5 building standards apply to SRA and High/Very High FHSZ in the LRA, removes reliance on the WUI definition, and aligns with the proposed scope changes.

Agency Response:

The SFM appreciates the intent of the recommendation and will further study any additional amendments during a future rulemaking cycle.

SUB-ITEM 4-2

Chapter 5 Special Building Construction Regulations, Sections 503.2, 503.2.1, 503.2.1.1, 503.2.1.1.1, 503.2.1.1.2, 503.2.2, 503.2.3, 503.2.3.1, 503.2.3.2, 503.2.3.3, 503.2.3.3.1, 503.2.3.3.2, 503.2.3.3.3, 503.2.3.3.4, 502.5, 503.3, 503.4, 503.5, 503.5.1, 503.5.2, 503.5.3, 503.5.4

Early adopt provisions from the ICC 2024-2026 Code Development Cycle, Group A, as SFM amendments, and propose additional amendments.

Commenter(s) and Recommendation:

Loren Ross, Code Compliance Engineer, Arclin.

The comment supports relocation of the language, but requests that the reference to “chapter” be revised to “section” to clarify that the provision does not prohibit the use of surface treatments beyond the intended scope.

Agency Response:

The State Fire Marshal (SFM) appreciates the concerns expressed in the comments. The SFM will continue to evaluate and identify opportunities for reducing wildfire risk.

Commenter(s) and Recommendation:

Troy Wood, Sekisui House.

The comment is concerned that the surface treatment language is unclear, may appear to apply to materials other than exterior products, and may result in regulatory challenges.

Agency Response:

The State Fire Marshal (SFM) appreciates the concerns expressed in the comments. The SFM will continue to evaluate and identify opportunities for reducing wildfire risk.

Commenter(s) and Recommendation:

Marcelo M. Hirschler, Fire Safety Consultant, GBH International, Code Compliance.

The comment supports the entire group of SFM, Part 7, CWUIC proposals.

Agency Response:

The SFM appreciates the support.

SUB-ITEM 4-8

Section 504.5 Exterior walls

SFM proposes to make editorial corrections and to provide clarity of the intent of the regulations

Commenter(s) and Recommendation:

Paul Armstrong, P.E., CBO, Western Regional Manager, American Wood Council; Garet Emmerson, Director of Technical Services, Sierra Pacific Industries; Chad A. Turner, General Manager, Swiss Krono; Loren Ross, Code Compliance Engineer, Arclin; Rick Lappin, Senior Product Development Engineer, Modern Mill Inc.; Jeff Keller, President, Western Wood Products Association; Chris Andrews, Director, Fire Innovation, LP Building Solutions; Eric Gu, Vice President of Technical Services Division, APA – The Engineered Wood Association; Jared Wilson, Market Manager, Bodyguard Wood Products; Ken Pratt, Plywood Technical Services Manager, Swanson Group; R. Smith, Unity Forst Products. Comment received after 45-Day public comment closed: Ryan Adamson, Director of Operations, MOSO North America

Recommendation: The comments request changes to the proposed language to reduce potential confusion and potential conflicts.

Agency Response:

The State Fire Marshal (SFM) appreciates the concerns expressed in the comments. The SFM will continue to evaluate and identify opportunities for reducing wildfire risk.

Commenter(s) and Recommendation:

Brandon Higgins, Director of Optimization and Technology, Roseburg Forest Products; Rick Lappin, Senior Product Development Engineer, Modern Mill Inc.

The comment requests an update to the proposal language to ensure that exterior wall coverings that are part of an assembly are not required to undergo separate testing and listing. The comment expresses concern that the current language could be interpreted as requiring exterior wall coverings that are part of an assembly to be separately tested and listed, rather than being approved as a component of a tested and listed assembly. The comment also requests that the reference to standard "SFM-7A-1" in 504.5.1 #6 be revised to reflect "SFM Standard 12-7A-1", consistent with current code terminology.

Agency Response:

The State Fire Marshal (SFM) appreciates the concerns expressed in the comments. The SFM will continue to evaluate and identify opportunities for reducing wildfire risk.

Commenter(s) and Recommendation:

Greg Andersen, Codes & Standards Engineer – Wildfire, Insurance Institute for Business & Home Safety (IBHS).

The comment requests revisions to the exterior wall proposal to provide clarity of the options for exterior wall compliance, consistent terminology referencing exterior wall fire-resistance ratings, clarity of flashing installation locations and orientation, and editorial corrections. The comment also expresses a potential conflict between section 504.5 and sections 504.5.1 and 504.5.2, creating uncertainty in application as well as potential redundancy of exterior wall requirements,

Agency Response:

The SFM agreed that additional clarification is needed to provide a clear path to compliance. The SFM convened a CWUIC work group meeting, and the work group's revisions were incorporated into a 15-day public comment period. One public comment was received in support. The revised item is shown in the Final Express Terms.

Commenter(s) and Recommendation:

Shamim Rashid-Sumar, PE, Senior Vice President, Codes & Standards, National Ready Mixed Concrete Association.

The comment requests revisions to the exterior wall proposal to provide clarity, remove redundant language, and retain noncombustible construction as a recognized mode of exterior wall construction.

Agency Response:

The SFM agreed that additional clarification is needed to provide a clear path to compliance. The SFM convened a CWUIC work group meeting, and the work group's revisions were incorporated into a 15-day public comment period. One public comment was received in support. The revised item is shown in the Final Express Terms.

Commenter(s) and Recommendation:

California Building Industry Association, California Apartment Association, California Business Properties Association, and Building Owners & Managers Association.

Generally Supported. The coalition acknowledges concerns raised by other commenters about vagueness but notes that the proposed 15-day language appears to resolve them. They agree with the SFM's intent to prevent exterior wall coverings from carrying fire upward to the eaves and roof.

Agency Response:

The SFM agreed that additional clarification is needed to provide a clear path to compliance. The SFM convened a CWUIC work group meeting, and the work group's revisions were incorporated into a 15-day public comment period. One public comment was received in support. The revised item is shown in the Final Express Terms.

Commenter(s) and Recommendation:

Karen Martinez.

The comment does not directly apply to a specific proposal. However, the comment requests future discussions regarding non-combustible construction in wildfire-prone areas.

Agency Response:

The SFM agreed that additional clarification is needed to provide a clear path to compliance. The SFM convened a CWUIC work group meeting, and the work group's revisions were incorporated into a 15-day public comment period. One public comment was received in support. The revised item is shown in the Final Express Terms.

SUB-ITEM 4-10

Section 504.8 Exterior glazing and subsections

SFM proposal from the 2025 CWUI Work Group – Windows Subgroup.

Commenter(s) and Recommendation:

California Building Industry Association, California Apartment Association, California Business Properties Association, and Building Owners & Managers Association.

The comments support the SFM CAC revisions.

Agency Response:

The SFM appreciates the support.

SUB-ITEM 4-12

Section 504.10.1 Vent testing

SFM proposal from the 2025 CWUI Work Group – Vent Subgroup

Commenter(s) and Recommendation:

Slate Bryer, New Cal Metals.

The comment requests the language requiring vents to be “listed” that was removed be returned.

Agency Response:

The SFM agreed with the need for the language to include ‘listed’. The item was revised and incorporated into a 15-day public comment period. One public comment was received in support. The revised item is shown in the Final Express Terms.

Commenter(s) and Recommendation:

Kevin Scott, President, KH Scott & Associates LLC.

The comment requests that the language requiring testing of vents in both the horizontal and vertical positions be removed from the proposal. The comment states that many vents are designed to be installed in only one orientation, and that requiring products to perform when installed contrary to their design forces manufacturers to design for conditions their products will never encounter and increases construction costs.

Agency Response:

The State Fire Marshal (SFM) appreciates the concerns expressed in the comments. The SFM will continue to evaluate and identify opportunities for reducing wildfire risk.

ITEM N/A

Comments not tied to a specific SFM proposal

Commenter(s) and Recommendation:

California Code Professionals: Darcy Davidson - Fire Marshal/Division Chief, Justin Gipson - Fire Marshal/Division Chief, Kevin Reinertson - Retired Division Chief, Larry Williams - Retired Assistant Fire Marshal, Marty Walters – County Coordinator, Plumas County Fire Safe Council, and Robert Marshall – Retired Deputy Fire Chief San Mateo Consolidated Fire Department

The commenter requests additional changes to Chapters 4, 5, and 6, as well as the Matrix Adoption Tables, for which SFM has not yet proposed any changes.

Agency Response:

The SFM appreciates the concerns expressed in the comments. The SFM will continue to convene the CWUIC Workgroup to engage stakeholders and fire officials.

Commenter(s) and Recommendation:

M. Ensworth, RFP Lumber Co., Inc.

The commenter requests that the proposal consider the impacts on small businesses. The commenter states that if the proposal moves forward as written, many companies will close and cease all operations.

Agency Response:

The SFM recognizes the importance of balancing public safety with consideration of potential economic impacts. The proposed amendments are intended to improve the survivability of buildings in wildfire-prone areas.

COMMENT RECEIVED DURING 15-DAY PUBLIC COMMENT PERIOD:

ITEM 4

Chapter 5 Special Building Construction Regulations

SUB-ITEM 4-8

Section 504.5 Exterior walls

Commenter(s) and Recommendation:

Marcelo M. Hirschler, Fire Safety Consultant, GBH International, Code Compliance.

The comment supports the proposal.

Agency Response:

The SFM appreciates the support.

DETERMINATION OF ALTERNATIVES CONSIDERED AND EFFECT ON PRIVATE PERSONS

Government Code Section 11346.9(a)(4) requires a determination with supporting information that no alternative considered would be more effective in carrying out the purpose for which the regulation is proposed, or would be as effective and less burdensome to affected private persons than the adopted regulation, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

SFM has determined that no reasonable alternative would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed action. In addition, no reasonable alternative considered by the SFM or that has otherwise been identified and brought to the attention of the SFM would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

REJECTED PROPOSED ALTERNATIVE THAT WOULD LESSEN THE ADVERSE ECONOMIC IMPACT ON SMALL BUSINESSES:

Government Code Section 11346.9(a)(5) requires an explanation setting forth the reasons for rejecting any proposed alternatives that would lessen the adverse economic impact on small businesses, including the benefits of the proposed regulation per 11346.5(a)(3).

N/A